

Q: Will the OPI provide technical assistance workshops for the competitive funds?

A: For the competitive funds under Title II Part D, OPI provides technical assistance through Michael Hall and will continue to do so. For the new innovation grants for districts under the ARRA, there will likely be assistance and presentations on the grants once federal guidance is given.

Q: When will I be able to expend Title I and IDEA Funds?

A: For the funds for Title I and IDEA under the ARRA, e-grant applications should become available in early May. Once they are submitted they will be reviewed and hopefully approved. This would allow the funds to begin being used in May. Regular Title I and IDEA funds will become available starting July 1.

Q: Is it possible to obtain a waiver on the amount allowed to carry over from Title I?

A: Yes, under Title I regulations districts may obtain waivers on the 15% carryover limit once every three years. Additionally, as a state, we can apply to allow this to happen more often if it is needed.

Q: Does Supplement/Supplant apply to Title I funds?

A: Yes, supplement not supplant applies to Title I-A funds under the Recovery Act. Districts need to take care in how they plan the programs and activities because of this.

Q: Can our Maintenance of Fiscal Effort under IDEA part B be reduced because of the Recovery Act funds?

A: Yes, the Recovery Act almost doubles the money under IDEA part B meaning that the current maintenance of fiscal effort can be reduced by one half the size of the increase or close to one quarter of total IDEA part B. Schools will receive substantial flexibility in reducing fiscal effort.

Q: Can ARRA Title I funds be used to pay salaries that are currently being paid out of the general fund?

A: This would normally raise a question about possible supplanting. However, if you can document that these positions would no longer be funded due to general fund shortfalls, the Title I money may be used to carry on the purpose and intent of Title I.

Q: Can ARRA IDEA funds be used to pay Special Ed salaries that are currently being paid out of the general fund?

A: Yes. The substantial increase in IDEA Part B funds provided through the ARRA coupled with the maintenance of fiscal effort flexibility in IDEA will allow some shifting of payment for teacher salaries from the general fund to the IDEA federal fund. However, the district must meet the maintenance of fiscal effort requirements of IDEA.

Be very careful when making this shift to be sure your district does not fall below the maintenance of fiscal effort threshold. The penalty for falling below the threshold is a dollar for dollar repayment from the district's general fund to the United States Department of Education. IDEA regulations on maintenance of fiscal effort include a number of variables that establish the threshold of general fund spending needed to maintain fiscal effort. If you have questions please call Frank Podbnik at 444-4428.

Q: When will you provide guidance regarding accounting codes to track the new funds?

A: As soon as we are able to determine how these funds will be made available then we will share with you what accounting codes will be used.

Q: Can we add staff to reduce class size with ARRA money?

A: Yes, in a school wide program for Title I, but not with Special Ed money or in Title I targeted assistance schools. However, a district could use the money that is freed up under the general fund due to increased Title I and IDEA funds. If Title I allowable activities were previously funded with state and local funds, the district must document through School Board minutes or other official means that the activity could no longer be continued due to lack of state and local funds before Title I federal funds may now pay for the activities.

Q: With ARRA, could we pay the costs of supplanting Title I funds with general fund money for the last couple of years when we didn't have sufficient Title I funds?

A: Provided that these services would no longer be provided due to a shortfall in the general fund. (See above answer.) Normally, this would be viewed as supplanting but the assumption of supplanting can be rebutted with the documentation that the activity could no longer be maintained due to lack of state and local funds.

Q: Is it ok for schools to reduce carryover to the current year grants, by picking up legitimate Title I and IDEA expenditures now covered by the general fund with current Title I and IDEA dollars?

A: Yes, as long as the expenditures transferred to Title I and IDEA are legitimate under those programs and the documentation described in the previous answer for the rebuttal of supplanting is in place.

Q: Will we receive a regular allocation for these programs for the next fiscal year?

A: Yes

Q: What are the carry-over allowances and time frames for Title I funds and IDEA funds?

A: For Title I, the time frame is an initial period that ends September 30, 2010, and the 15% carryover limits apply at that time. However, a waiver to this limit is available. For IDEA, the time frame is an initial period that ends June 30, 2010 with 100% carryover allowed. Both Title I and IDEA funds then continue to be available until September 30, 2011.